

HEARING DATE AND TIME: July 18, 2016 at 10:00 a.m. (Eastern Time)
OBJECTION DEADLINE: July 11, 2016 at 4:00 p.m. (Eastern Time)

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Avoidance Action Trust*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

MOTORS LIQUIDATION COMPANY, f/k/a
GENERAL MOTORS CORPORATION, *et al.*,

Chapter 11

Case No. 09-50026 (MG)
(Jointly Administered)

Debtors.

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**NOTICE OF HEARING ON MOTION OF MOTORS LIQUIDATION COMPANY
AVOIDANCE ACTION TRUST FOR ENTRY OF ORDER PURSUANT TO SECTIONS
105 AND 1142 OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3020(d)
APPROVING LITIGATION FUNDING AGREEMENT**

PLEASE TAKE NOTICE that on June 23, 2016, Wilmington Trust Company, solely in its capacity as trust administrator and trustee (in such capacity, the “**Avoidance Action Trust Administrator**”), of the Motors Liquidation Company Avoidance Action Trust (the “**Avoidance Action Trust**”), as established under the Debtors’ Second Amended Joint Chapter 11 Plan dated as of March 18, 2011 [Bankr. Dkt. No. 9836] (as confirmed, the “**Plan**”) of the above-captioned post-effective date debtors (the “**Debtors**”), filed a motion (the “**Motion**”) for an order, pursuant to sections 105 and 1142 of title 11 of the United States Code (the “**Bankruptcy Code**”) and Rule 3020(d) of the Federal Rules of Bankruptcy Procedure (the

“Bankruptcy Rules”), (i) approving the litigation funding agreement attached to the Motion as Exhibit B (the **“Litigation Funding Agreement”**), (ii) authorizing the Avoidance Action Trust to take all actions necessary or appropriate to effectuate the Litigation Funding Agreement, including the granting of a lien on the Term Loan Avoidance Action (as defined in the Motion) and other specified property of the Avoidance Action Trust; and (iii) granting such other and further relief as may be necessary, all as more fully described in the Motion, and that a hearing will be held before the Honorable Judge Martin Glenn, United States Bankruptcy Judge, in Room 523 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **July 18, 2016 at 10:00 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses or objections to this Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s filing system, and (b) by all other parties in interest, on a CD-ROM or 3.5 inch disk, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 and on Binder & Schwartz LLP, attorneys for Wilmington Trust Company as Avoidance Action Trust Administrator, 366 Madison Avenue, 6th Floor, New York, New York 10017 (Attn: Eric B. Fisher, Esq. & Neil S. Binder, Esq.), so as to be received no later than **July 11, 2016 at 4:00 p.m. (Eastern Time)** (the **“Objection Deadline”**).

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served with respect to the Motion, Wilmington Trust Company, acting in its capacity as Avoidance Action Trust Administrator may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York
June 23, 2016

BINDER & SCHWARTZ LLP

/s/ Eric B. Fisher
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